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POSTAL RATE COMMISSION
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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DAVID B. POPKIN,
REDIRECTED FROM THE POSTAL SERVICE
(DBP/USPS-104, 106-112)

The United States Postal Service hereby provides the responses of witness Mayo to the following interrogatories of David B. Popkin: DBP/USPS-104, and 106 to 112, filed on December 18, 2001, and redirected from the Postal Service. A response to interrogatory DBP/USPS-105 and 113 are being prepared.

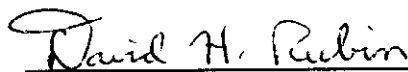
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

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January 4, 2002

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO
INTERROGATORIES OF DAVID B. POPKIN (DBP/USPS-104-113)
REDIRECTED FROM THE POSTAL SERVICE**

DBP/USPS-104. Please refer to your response to OCA/USPS-237 subpart a. [a] Please provide details of those instances that have been corrected and the method utilized to provide the service at those location[s]. [b] Please provide an estimate of the percentage of high volume recipients that now have their return receipts processed in accordance with the provisions of the DMM. [c] Please advise the details of any programs that will be utilized to improve the percentage of return receipts that are processed in accordance with the provisions of the DMM. [d] Please advise when the Postal Service expects to have the problem fully corrected and all return receipts that are processed in accordance with the provisions of the DMM.

RESPONSE:

[a] The response was based on general knowledge that problems with return receipt processing have been corrected at some locations, based on the improved management of certified mail during the 2001 tax season. Detailed information on every location and method has not been collected, beyond what has been provided in the Postal Service's response to OCA/USPS-236, and in OIG audits already provided, or mentioned in response to OCA/USPS-236 (a) (ii-iii).

[b] *These data have not been collected.*

[c] No such program is currently in place. It is possible programs may be developed to prepare for the 2002 tax season. Also see the response to OCA/USPS-236.

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DBP/USPS-104. (CONTINUED)

RESPONSE:

[d] The Postal Service does not have an expectation as to a particular date to resolve any problems related to return receipts delivered to high-volume locations.

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DBP/USPS-106. Please refer to your response to OCA/USPS 238 subpart g. [a] Please provide a draft copy of the proposed communication and advise the method of dissemination. [b] Please provide copies of any other actions that have been taken over the past three years relating to the proper completion of return receipts.

RESPONSE:

[a] The communication has not been drafted yet. Dissemination will be through the usual internal communications channels used for window clerks, carriers, and postmasters/supervisors.

[b] Please see the responses to DBP/USPS-76[b] and OCA/USPS-236.

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DBP/USPS-107. Please refer to your response to DBP/USPS-61. Please provide specific details that are now being utilized by the Philadelphia post office for processing both the Certified Mail and the associated return receipts including sample copies of any forms that are being utilized and of a sample completed return receipt form.

RESPONSE:

The Postal Service assigns an employee to the mailroom of the IRS facility in Philadelphia. When certified mail with return receipts is delivered, a manifest listing all of the pieces is presented. An IRS employee verifies that the manifest lists the pieces being delivered, and signs the manifest. The return receipt cards are detached, and, in the presence of the postal employee, are completed while the certified mail remains in the mailroom. The postal employee receives the return receipt cards back, and the certified mail is released for transfer to the processing section of the IRS.

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DBP/USPS-108. Please refer to your response to DBP/USPS-61. [a] Please advise why the Atlanta, Memphis, and Cincinnati Post Offices continue to process return receipts in a manner that does not meet the requirements of the DMM/POM. [b] Please advise the steps being taken to bring these offices into compliance and the estimated date for such action.

RESPONSE:

[a] Their practices probably reflect difficulties in coordination with the IRS to handle high volumes at peak periods. See rebuttal testimony of witness Plunkett (USPS-RT-20) in Docket No. R97-1, at 8-9 (Tr. 32/17124-25), and his responses at the hearing on that testimony, at Tr. 32/17173.

[b] See my response to DBP/USPS-104 (c).

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DBP/USPS-109. Please refer to your response to DBP/USPS-76 subpart a. [a] Please confirm, or explain if you are not able to do so, that the March 2, 2001 letter does not relate to the processing of return receipts on mail sent to the IRS. [b] Please confirm, or explain if you are not able to do so, that the March 2, 2001 letter relates only to the processing of the mailpiece itself and special services such as, Delivery Confirmation, Signature Confirmation, Certified Mail, and Registered Mail. [c] Please advise why the processing of return receipts was not included in this letter. [d] Please provide complete details of the "delayed processing of tax returns" as related in line 1 of the letter. [e] Please provide complete details of the "negative publicity" as related in line 2 of the letter including copies of any newspaper and other articles that are available. [f] Please provide sample copies of PS Forms 3883 and 3833 as referred to in the letter.

RESPONSE:

[a-c] Not confirmed. The letter specifically states that "[p]ostal employees must provide the appropriate service indicated on each IRS mailpiece." Many of these pieces indicate return receipt service. Moreover, a reference to proper processing of certified mail is generally understood to include proper processing of the return receipt.

[d-e] See the OIG audit report in library reference J-172, and the attachment to interrogatory DFC/USPS-118 in Docket No. R2000-1.

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DBP/USPS-109. (CONTINUED)

RESPONSE:

[f] The reference to Form 3833 should be to Form 3883. A copy of Form 3883 has been provided previously in this docket, in my response to OCA/USPS-T36-2(f).

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DBP/USPS-110. Please refer to your response to DBP/USPS-76 subpart b. Please confirm, or explain if you are not able to do so, that the three Postal Bulletin pages provided relate to the proper use of labels that are privately printed by mailers for use on their outgoing mail and provide no information on the delivery procedure of accountable mail or on any phase of return receipts.

RESPONSE:

Not confirmed. Proper barcodes on the accountable mail labels are directly connected to proper delivery procedures and the ability to electronically capture the delivery record. The Postal Bulletin pages do not relate to return receipt procedures, however.

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DBP/USPS-111. Please refer to your response to DBP/USPS-79 subparts a and b. [a] Please explain at what point an Electronic Return Receipt service obtained over the Internet for \$1.30 gets converted into an Internet request for a Return Receipt after mailing for \$3.25. [b] How late after the mailing of the original mailpiece may a mailer request an Electronic Return Receipt service obtained over the Internet for \$1.30? [c] Please advise the type of information that will be provided by the Postal Service in each of these two services.

RESPONSE:

[a] An electronic return receipt is a separate product from a return receipt after mailing and thus is not "converted" into a different product.

[b] An electronic return receipt can be requested over the Internet within 6 months of mailing.

[c] An electronic return receipt and a return receipt after mailing would provide the same information however via different formats.

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DBP/USPS-112. Please refer to your response to DBP/USPS-79 subpart c. [a] Please provide a draft of the proposed procedures. [b] If the procedures have not been determined yet, please provide the details of how you determined that the service will require a \$3.25 fee. [c] I am looking for a narrative, as opposed to the regulations, of the steps that a mailer and the postal employee will take in providing this service in each of the two methods so that a comparison may be made of the costs involved including those steps that require employee time and an indication of the time spent. Providing a manual return receipt after mailing seems to be far more labor intensive than the same service provided over the Internet and I would like the data to investigate this.

RESPONSE:

[a] Specific operating procedures have not yet been drafted.

[b] Please see my testimony, USPS-T-36, at pages 55-57 for the fee development and pricing criteria for return receipts after mailing.

[c] The detailed cost estimates presented in USPS-LR-J-135, Return Receipts Workbook, Worksheet C-4 allow a comparison of the costs involved for each of the two methods.

DECLARATION

I, Susan W. Mayo, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

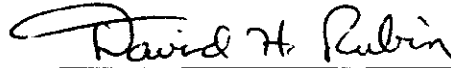
Susan W Mayo

SUSAN W. MAYO

Dated: JANUARY 4, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



David H. Rubin

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
January 4, 2002